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Title: Sample Information Forms and Chain of Custody		
Revision: 6	Replaces: 4/24/06	Effective: 4/18/07

1. Purpose:

To establish proper use of Sample Information Forms (SIFs) and Chain of Custody procedures for implementation by all States/facilities collecting samples for the USDA/AMS Pesticide Data Program (PDP).

2. Scope:

This Standard Operating Procedure (SOP) shall be followed by all individuals collecting and shipping samples for PDP.

3. Outline of Procedure:

- 5.1 PDP General Requirements
- 5.2 Paper Sample Information Forms
- 5.3 Electronic Sample Information Forms
- 5.4 Chain of Custody

4. References:

- Sampling Managers' Conference Call, March 19, 2007
- PDP/MDP Technical Meeting, Richmond, VA, March 27-31, 2006
- Sampling Managers' Conference Call, March 13, 2006
- Email communication from Ken Stoub, Group Seven Environmental Services, May 20, 2005
- Meeting with MPO database personnel, Roger Fry and Milton Bonilla, to discuss electronic sample information form requirements, March 30, 2005
- PDP Federal/State Meeting, Fairfax, VA, October 26-28, 2004
- MDP/PDP Remote Data Entry (RDE) e-SIF Software Information Sheet, August 23, 2004
- User Guide for PDP/MDP Remote Data Entry (RDE) System, July 23, 2004

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- Sampling Managers Meeting, Manassas, Virginia, June 18-19, 2002
- Semi-Annual Program Plan, June-December 2002
- Federal-State Meeting, Seattle, Washington, October 30-November 1, 2002
- SAMP APPE-1: A blank Sample Information Form (version effective January 1, 2000) with accompanying instructions.
- Sampling Managers Meeting, Alexandria, Virginia, April 18-19, 2000
- Federal/State meeting, Alexandria, VA, October 26-28, 1999

5. **Specific Procedures:**

5.1 PDP General Requirements

- a. The sample collector shall ensure that *one* SIF is completed for <u>each assigned site</u> sample. A SIF must be completed even if a site sample was not collected.
- b. In addition to sample identification information, the PDP SIF should include available facts regarding State of origin, grower, packer, distributor, and lot number; and details pertaining to agricultural practices employed during or after production such as organically grown or chemically treated with sanitizers.
- c. Product variety information should always be included on the SIF, when available.
- d. When proxy sites are used for sample collection, the sample collector shall include a "P" on the form, the proxy site's name and address, and a reason for the use of a proxy site.
- e. Collectors shall ensure that SIFs are fully and correctly completed and that the correct number of SIFs is submitted. SIFs allow MPO to track the number and type of samples collected, the number of missing samples, and the reason(s) why the sample was not collected/analyzed. States should make every effort to provide the assigned number of samples each month.

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- f. It is important that sample collectors complete all necessary fields of the SIF. Free-form fields such as Variety, Packer Name, Grower Name, Distributor Name, Lot Number/Other ID, and Post Harvest Fungicide Labeling **must not be left blank**. If the requested information cannot be found on the commodity container/box/carton, the sample collector shall enter "NA" or "na" in the field provided for that information. Fields left blank yield no valuable information.
- g. It is strongly recommended that when routine tracking information is not available, the collector should record any other available identification information that could be used to track the sample in the Comments Field of the SIF.
- h. The Environmental Protection Agency occasionally requests that special information (specific ingredients, expiration date, generic varieties, etc.) be recorded and collected for certain commodities. Sample collectors are required to include this information on their SIFs. The MPO Sampling Manager prepares and distributes quarterly Quick Reference Sheets for sample collectors that list these special requests and explain where the information should be recorded on the SIF. Also included on the Quick Reference Sheet is a list of current unacceptable commodities---commodity types that should not be collected.
- i. The use of either paper or electronic versions of the SIF are acceptable. However, when all States have converted to the electronic system, paper SIFs will be acceptable only in instances where problems occur with the use of the electronic version.
- j. If, due to illness, natural disaster, weather conditions, etc., a State is unable to collect the scheduled sample(s), a new collection date shall be rescheduled for a different week/day of that month with the approval of the receiving laboratory. When the items are collected on the rescheduled date, the new collection date shall be entered on the SIF.

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- k. If re-scheduling must occur during the following month [refer to PDP SAMP PROC-02, Section 5.1(f) for special exceptions], the new collection date shall be entered on the SIF, along with a brief explanation of the delay.
- 1. If the sample collector has no samples to ship, he/she should notify the State Sampling Manager, complete the SIF with the required information, and email or fax the SIF to the appropriate laboratory.
- m. Once the sample collector has mailed, faxed, or e-mailed the SIF, no changes shall be made to the document without approval from the State Sampling Manager.

5.2 Paper Sample Information Forms

- a. Sample collectors shall ensure that all applicable portions of the form are <u>PRINTED</u> neatly and legibly. Mistakes on the SIF shall be marked through with a single line and dated and initialed at the time of the correction.
- b. The SIF must be signed and dated by the sample collector at the time of collection. If someone else collects the sample in place of the originally assigned collector, that individual must sign the form. Forms should never be pre-signed prior to sample collection.
- c. SIFs for uncollected samples shall be packed in a separate sealed plastic bag in the same box with any other samples collected by the sample collector and mailed to the designated laboratory(ies).
- d. Sample collectors shall refer to the PDP SIF instruction sheets for further explanation on filling out the form. Instructions may be found on the following website: www.ams.usda.gov/science/MPO/SOPs.htm.

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- 5.3 Electronic Sample Information Forms (e-SIFs)
 - a. Sample information is entered on a windows-based laptop/desktop or a handheld computer.
 - b. Proper training for all sample collectors on the use of the e-SIF system is strongly recommended.
 - c. Sample information shall be entered into the e-SIF system as specified in the "User Guide for PDP/MDP Remote Data Entry (RDE) System" referred to in Section 4 of the guide. If someone else collects the sample in place of the originally assigned collector, that individual must enter his/her name in the Comments Field of the e-SIF.
 - d. Information may be pre-entered into the sample collector's e-SIF device; however, special care must be taken to review all entered data **AFTER** sample collection is completed. As an example, an unplanned change in collection site may necessitate site code changes/additions. Re-checking is important to ensure that accurate comparisons can be made between the sample once it is received at the laboratory and its corresponding e-SIF.
 - e. Multiple samples may be reported from the e-SIF system into a text file that shall be transmitted to MPO.
 - f. All e-SIF text files shall be e-mailed to a designated USDA account (amsmpo.data@usda.gov).
 - g. It is strongly recommended that e-SIF files be emailed on the same day as sample collection; however, e-SIF files must be e-mailed no later than 8:00 a.m., Eastern Time, on the day following sample collection.
 - h. State Sampling Managers shall update new RDE program information on their State's field computers (handheld or laptop computers) when notified by MPO that the RDE program is being revised.

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5.4 Chain of Custody

Chain of custody requirements ensure the chronological possession of samples as they pass from sample collector to the carrier to the laboratory.

- a. When paper SIFs are used, written documentation of the sample collector's possession of the sample shall include the commodity collected, the site code, the date the samples were collected, the signature of the individual collecting and packaging the samples, and the date and time of transfer to the carrier.
- b. When electronic SIFs are used, written documentation (a paper SIF placed inside the sample shipping container) is unnecessary if all sample collection information entered into the electronic SIF is received by the laboratory.
- c. A legible and permanently marked notation must **always** be placed on the outside of each sample bag. The notation shall include: (1) sample ID [for example, CO-050819-0046-OG-WA1. Refer to PDP SAMP PROC-02, Section 5.3(c)(6) for an explanation on sample ID numbers], (2) collector name, and (3) alternate or proxy site information (if applicable). Tamper-proofing tape placed around the sample bag or around the knot in the sample bag shall be initialed and dated by the sample collector who has bagged the sample. This information, coupled with a Quarterly Sampling Schedule that each laboratory maintains on file, will suffice to complete chain of custody requirements and will allow initiation of sample processing and analysis in the event of a delayed e-SIF.
- d. The sample collector shall ensure that all chain of custody requirements are fulfilled.

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- Updated References.
- Updated Effective date
- Changed "or" to "and" between the words, "distributor" and "lot number" in Section 5.1 (b)
- Sections 5.1 (f), (g), and (h) are new additions.
- In Section 5.3 (g), "noon" was changed to "8:00 a.m."
- The sentence, "Tamper-proofing tape placed around the sample bag or around the knot in the sample bag shall be initialed and dated by the sample collector who has bagged the sample." was added to Section 5.4 (c).